

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KERRY LANGSTAFF, et al
Petitioners/Respondents

v.

**ALLEN A. MITCHELL, M.D.,
SAMUEL M. LESKO, M.D., and
TRUSTEES OF BOSTON UNIVERSITY**

Petitioners/Respondents

§ Civil Action No. 04-MBD-10128
§ and No. 04-MBD-10137
§
§ Related Civil Action:
§ United States District Court for the
§ Northern District of California, San
§ Jose Division
§ Civil Action No. 03-CV-01116
§ KERRY LANGSTAFF, et al vs.
§ MCNEIL CONSUMER &
§ SPECIALITY
§ PHARMACEUTICALS, et al
§
§

FILING FEE PAID: 56.08
RECEIPT # 50.00
AMOUNT \$ 50.00
BY DPTY CLK 3/21/04
DATE 3/21/04

**MOTION FOR ADMISSION PRO HAC VICE OF
SCOTT M. DOLIN**

The undersigned hereby moves this Honorable Court, pursuant to Local Rule 83.5.3 for an Order authorizing the Admission, *pro hac vice*, of Scott M. Dolin, Esquire, an associate with the law firm of Waters & Kraus, to act as counsel in the above-captioned case. Waters & Kraus represents clients in various pharmaceutical products liability actions across the country. In support of this Motion, the undersigned respectfully represents as follows:

1. The undersigned is a partner of the law firm of COADY & ASSOCIATES, 205 Portland Street, 5th Floor, Boston, Massachusetts; 02114-1721, Telephone (617) 742-9510, Fax (617) 742-9509.
2. The Langstaff Plaintiffs represented by Waters & Kraus with claims against McNeil Consumer & Specialty Pharmaceuticals, a Division of McNeil-PPC, Inc., and Johnson and Johnson is a party in interest in the above-captioned proceeding.
3. This Motion is being filed for the purpose of permitting Waters & Kraus to monitor and participate as a party in interest in the above-captioned proceedings.

4. The undersigned is an active member in good standing of the Bar of United States District Court for the District of Massachusetts.

5. Scott M. Dolin, is an associate with the law firm of Waters & Kraus, which represents numerous individuals with claims stemming from various pharmaceutical products, and is a member in good standing of the Bars of Texas, California, New York and West Virginia. Mr. Dolin is admitted to practice before the U.S. District Courts for the Northern and Eastern Districts of Texas and the Southern District of West Virginia. Service of notices and pleadings may be made upon Scott M. Dolin, Esquire at the following address: WATERS & KRAUS, 3219 McKinney Avenue, Dallas, TX 75204. Scott M. Dolin, Esquire can also be reached by telephone at (214) 357-6244, by facsimile at (214) 871-3122 or by e-mail at sdolin@awpk.com.

6. Scott M. Dolin, is not under suspension or disbarment by any Court. No disciplinary actions or complaints have been made against him, nor are any disciplinary proceedings pending.

7. Scott M. Dolin, is an experienced legal practitioner in the field of pharmaceutical litigation, has represented and continues to represent numerous plaintiffs in products liability around the country, and is familiar with the above-captioned case.

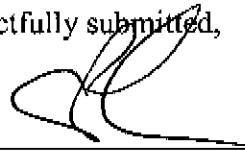
8. An Affidavit of Scott M. Dolin in support of this Motion is attached hereto and made a part hereof as Exhibit "A".

10. In consideration of the foregoing, the undersigned respectfully moves for the admission of Scott M. Dolin, *pro hac vice*.

Respectfully submitted,

Dated: May 20, 2004

BY:



Edward Coady
COADY & ASSOCIATES
205 Portland Street, 5th Floor
Boston, Massachusetts; 02114-1721
Tele: (617) 742-9510
Fax: (617) 742-9509

EXHIBIT “A”

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§ **MCNEIL CONSUMER &**
§ **SPECIALITY**
§ **PHARMACEUTICALS, et al**
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**AFFIDAVIT IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE
OF SCOTT M. DOLIN**

I, Scott M. Dolin, do hereby certify that:

1. I am an associate with the law firm of Waters & Kraus.
2. I am currently in good standing and am an active member of the State Bar of New York.
3. I am currently in good standing and am an active member of the State Bar of Texas.
4. I am currently in good standing and am an active member of the State Bar of California.
5. I am currently in good standing and am an active member of the State Bar of West Virginia.
6. I am currently in good standing and am an active member of the Bar of the United States District Court for the Northern District of Texas.

7. I am currently in good standing and am an active member of the Bar of the United States District Court for the Eastern District of Texas.

8. I am currently in good standing and am an active member of the Bar of the United States District Court for the Southern District of West Virginia.

9. I have not been disbarred, nor has my license to practice law been suspended by any court or jurisdiction. No disciplinary complaints have been made against me in any court or jurisdiction, nor are any disciplinary proceedings pending.

10. I am familiar with the provisions of the Judicial Code, which pertain to the jurisdiction of, and practice in, the United States District Courts, the Federal Rules of Civil Procedure, and the Local Rules of the United States District Court for the District of Massachusetts.

10. I agree upon my admission *pro hac vice* to be bound by the grievances procedures established in the rules of the District of Massachusetts and to be subject to the disciplinary and contempt jurisdiction of any Court of the District of Massachusetts during the course of my practice.

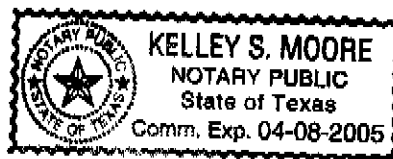
I verify under penalty of perjury under the laws of the United States of America that the foregoing is true.

Date:

Scott M. Dolin
Scott M. Dolin

Sworn to and subscribed
before me this 19th
day of May, 2004

Kelley S. Moore
Notary Public



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ORDER

AND NOW, this _____ day of May, 2004, upon consideration of the Motion for Admission *pro hac vice* of Scott M. Dolin, and the Court being satisfied that the requirements of this Court have been met, it is hereby ORDERED that the Motion is GRANTED; and it is ORDERED that Scott M. Dolin, be permitted to appear *pro hac vice* as counsel for the Langstaff Plaintiffs in the above captioned matter and all related cases.

BY THE COURT:

United States District Judge

Copies furnished to: See attached list

Erika Geetter

Boston University

125 Bay State Road

Boston, Massachusetts 02215

617-353-2326

Counsel for:

Boston University

Thomas Pulliam

Drinker, Biddle & Reath, L.L.P.

50 Fremont Street, 20th Floor

San Francisco, California 94105-2235

415-591-7500

Counsel for:

**McNeil Consumer & Specialty Pharmaceuticals, a Division
of McNeil-PPC, Inc.; and Johnson & Johnson**

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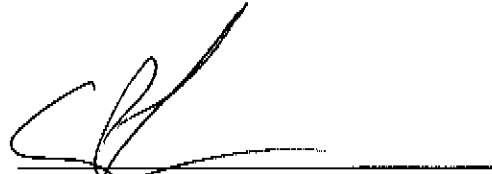
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CERTIFICATE OF SERVICE

I, Edward Coady, hereby certify that on this _____ day of May, 2004, I caused a copy of the Motion for Admission *Pro Hac Vice* of Scott M. Dolin, the Affidavit of Scott M. Dolin, in support of the Motion and a proposed form of Order to be served on the attached Service List by regular mail.


Edward Coady

SERVICE LIST

TO:

Erika Geetter
Boston University
125 Bay State Road
Boston, Massachusetts 02215
617-353-2326
Counsel for:
Boston University

Thomas Pulliam
Drinker, Biddle & Reath, L.L.P.
50 Freemont Street, 20th Floor
San Francisco, California 94105-2235
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Counsel for:
**McNeil Consumer & Specialty Pharmaceuticals, a Division
of McNeil-PPC, Inc.; and Johnson & Johnson**